Statement in support of Petition for Rulemaking RM-10995

The undersigned wholeheartedly supports a proposed change in the Rules to the extent that, if an FM translator were to find itself in the situation that a higher-priority station were to cause or receive interference with respect to the FM translator such that the translator might be forced to discontinue service, that the translator could, much in the same manner as Low Power TV facilities and TV translators, effect technical changes which would allow it to continue to provide service to its audience, even if changes required were to fall into the major change category, such as a change of output channel.

As an engineering consultant who practices in FM, FM translators, TV, and LPTV, I believe that the protection offered LPTV licensees would greatly benefit FM translator licensees and assure continuation of essential services which are now being lost.

James R. McDonald Wind River Group, Inc.